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Chancellor

Public Comment Analysis

Date: February 8, 2012

Topic: The Proposed Grade Truncation of Academy of Scholarship and Entrepreneurship (11X270) Beginning in 2012-2013

Date of Panel Vote: February 9, 2012

Summary of Proposal

On December 11, 2011, the New York City Department of Education (“DOE”) proposed to truncate the middle school grades of Academy of Scholarship and Entrepreneurship: A College Board School (11X270, “ASE”), a secondary school, located at 921 East 228th Street, Bronx, NY 10466, in Community School District 11 (“District 11”), in building X362 (“X362”) because of the middle school grades’ low performance and inability to turn around quickly to better meet student needs. ASE currently serves students in sixth through twelfth grades and admits students through the District 11 Middle School Choice Process and the Citywide High School Admissions Process (“High School Admissions Process”). If this truncation proposal is approved, ASE will no longer admit sixth-grade students after the conclusion of the 2011-2012 school year. The middle school grades will then be phased out, one by one, in each subsequent year until the middle school grades no longer serve any students. After June 2014, ASE will only be a high school, serving students in ninth through twelfth grades. Current middle students will continue to be served and supported by ASE as they progress toward completion of middle school. Eighth-grade students will be supported through the High School Admissions Process as they select a high school, including the option to continue at ASE.

ASE is currently “co-located” in building X362, also known as the Bronxwood Campus, with the following schools: New World High School (11X513, “New World”), The Bronxwood Preparatory Academy (11X514, “Bronxwood Prep”), and a District 75 school (“D75 school”), (75X754, “P754X”).

The DOE does not plan to replace ASE’s middle school grades because there are enough existing middle school seats in District 11 to accommodate middle school students.

Summary of Comments Received at the Joint Public Hearings

A joint public hearing regarding this proposal was held at the X362 school building on January 19, 2012. At that hearing, interested parties had an opportunity to provide input on the proposal. Approximately 140 members of the public attended the hearing, and 4 people spoke. Present at the meeting were Deputy Chancellor Laura Rodriguez; Family and Community Engagement representative and facilitator Anthony Settle; High School Superintendent Geraldine Taylor-Brown; Community Education Council 11 President Petra Poleon; ASE School Leadership Team Representative Dawn Harris; ASE PTA President Tiffany Robertson; UFT chapter leader Arlene Whiteman; Helen Tsang from the Office of Public Affairs; and Amanda Cahn and Stephanie Crane from the Division of Portfolio Planning.

The following comments and remarks were made at the joint public hearing:

1. Multiple commenters (including Justice Allison Tuitt of the Supreme Court, Bronx County and SLT member Aldean Whiteman) praised the school leadership.
2. Multiple commenters praised the school staff.
3. Multiple commenters praised ASE parents.
4. Multiple commenters praised initiatives at ASE, including the school's online grading system, its partnership with Montefiore Medical Center, and its collaborative teaching classes.
5. Multiple commenters pointed to students who succeed at ASE, from middle school through high school, and who continue on to college.
6. One commenter criticized communication between the school administration and staff, which has hindered teachers' ability to teach effectively.
7. Multiple commenters indicated that ASE did not have the resources it needed to succeed (i.e., library, science lab facilities, distance-learning lab, programming room, student government rooms);
8. One commenter described ASE's building as sub-par and unsafe.
9. Multiple commenters referred to issues with the building's certificate of occupancy.
10. Multiple commenters stated that ASE has had space challenges in its building because it is not situated on one floor of the building, as originally intended.
11. One commenter referred to challenges for ASE associated with the fact that it was co-located with other schools.
12. Multiple commenters pointed to the fact that ASE had to move a number of times, which has hampered its ability to succeed.
13. One commenter referred to the importance of respecting and preserving local history, noting that the campus is now called the Albert V. Tuitt campus, not the Bronxwood campus, as people commonly refer to it.
14. Multiple commenters stated that student safety was an issue on campus, which one commenter attributed to neighborhood safety issues; one commenter suggested that the DOE's supports have been insufficient with respect to safety.
15. One commenter stated that other schools seem more dangerous than ASE.
16. One commenter requested more middle school options for children in the community.

17. Multiple commenters stated that it was important to allow ASE to continue developing students from middle school through high school.
18. Multiple commenters expressed concern that siblings would not be able to attend ASE middle school; one commentator, a teacher, described ASE as a family school and said that she wanted the chance to keep educating siblings and future generations who wish to keep attending the school.
19. Multiple commenters requested additional time for the school to improve, and stated they felt it was unfair that the school has had insufficient time to turn around.
20. Multiple commenters questioned the sufficiency of supports provided to ASE before deciding upon truncation.
21. One commenter criticized communication from the DOE to the school community prior to its decision to truncate ASE, and additionally questioned whether the DOE had planned to close the middle school from its inception.
22. One commenter stated that working with the teachers and staff at ASE would be better than truncating the school.
23. Multiple commenters asked about supports that would be provided to the school during the truncation process to enable it to succeed and one commenter stated that the DOE should remember the importance of supporting the remaining grades at ASE. Another commenter questioned what the DOE will do differently here, in light of previous failures.
24. Multiple commenters questioned the decision to close the school after it had been open for such a short time period (three years); one commenter characterized this decision as demoralizing for the neighborhood.
25. One commenter criticized the policy behind school closures, stating that 11 of the school closures scheduled opened under Mayor Bloomberg and this will affect students who have already been traumatized by previous school closures. The commentator characterized closure decisions as admissions of failure by City Hall.
26. One commenter stated that schools proposed for phase-out are disproportionately located in disadvantaged communities and are attended by students of color. The commenter also indicated that such students do not have equal access to new replacement schools.
27. Multiple commenters inquired about what would happen to the space allocated to ASE's middle school as the school becomes truncated.
28. One commenter said there is a need for more support to the community surrounding the school.
29. One commenter asked if the middle school seats would be replaced.

Summary of Issues Raised in Written and/or Oral Comments Submitted to the DOE

30. Class Size Matters ("CSM"), submitted written comments objecting to all of the proposed phase-outs and truncations proposed by the DOE. In opposing the DOE's proposal to phase-out and eventually close these schools, the CSM comments cited the following reasons: (1) none of the Educational Impact Statements for the proposals include discussion of how the proposed phase-outs or, where applicable, the co-locations would affect class size; (2) the Citywide Instructional Footprint does not include class size standards; (3) the Educational Impact Statements use utilization figures from the DOE's Blue Book, which does not take into account the need to reduce class sizes in schools

Citywide; (4) the community members, faculty, and families of schools that have been proposed for phase-out have opposed the proposed phase-outs and truncations; (5) the schools that have been proposed for phase-out and/or truncation have high concentrations of “at-risk” students, as defined as English Language Learner students, students with disabilities, and economically disadvantaged students.

Analysis of Issues Raised, Significant Alternatives Proposed and Changes Made to the Proposal

Comments 1, 2, 3 and 4 voice support for ASE staff, leadership, and school community, and do not require a response.

The DOE acknowledges and commends the students, staff, leadership, and partners of ASE for their hard work, dedication, and passion for the school.

Comment 5 pertains to student achievement at ASE. While the DOE acknowledges that some ASE students may have achieved various positive outcomes at ASE, in a concerted effort to ensure that all students have access to high-quality school programs, the DOE annually reviews all performance of all schools Citywide. During the process that identifies schools that are having the most trouble serving their students, the DOE found ASE to be among these schools. As noted in the Educational Impact Statement, in the case of the middle school grades at ASE:

- The majority of ASE students remain below grade level in English and Math. Last year, only 27% of students were performing on grade level in English and only 28% of students were performing on grade level in Math.
- ASE is not adequately helping students to make progress. ASE is in the bottom 36% of all middle schools in District 11 in terms of learning growth in English and is the lowest performing middle school in District 11 in terms of learning growth in Math. Learning growth measures annual student growth on State ELA and Math tests relative to similar students. If these conditions persist, ASE students will fall further behind their peers in other schools.
- The Progress Report measures the progress and performance of students in a school as well as the school environment, compared to other schools serving similar student populations. ASE earned an overall D grade on its 2010-11 annual Progress Report, including D grades for Student Progress and Student Performance, and a C grade for School Environment. Based on ASE’s most recent Progress Report, the school is in the bottom 5% of middle schools Citywide.
- The Quality Review uses a four-tiered rubric (well-developed, proficient, developing, underdeveloped) to measure how well a school is organized to support student achievement. ASE was rated “Developing” on its most recent Quality Review in 2010-2011, indicating deficiencies in the way the school is organized to support student learning.

In addition to understanding this data, the DOE had conversations with school staff, parents, students, communities, and networks to get a holistic sense of what is happening at the school and what supports or interventions would most likely improve student outcomes. In early engagement meetings at these schools, the DOE had conversations with constituents about what is working and what is not working before making a decision about the supports or interventions that can best support student outcomes.

At the end of this multistep process, the DOE's analysis and engagement yielded a set of schools, including the middle school grades of ASE, that quantitative and qualitative indicators show do not have the capacity to significantly improve. Deciding what course of action can best support the students and community of a struggling school is not easy, but the DOE is compelled to act based on its commitment to ensuring that every student has access to high-quality school.

No single factor determines whether a school will be truncated. Deciding to truncate a school is among the toughest decisions the DOE makes. But it is the right thing to do for the students of New York City.

Comment 6 pertains to communication issues between school staff and administration. During the truncation, the DOE and the school support network will continue to work with ASE to enhance and improve communication between staff and administration to improve the overall instruction and performance at the school. For additional information regarding the supports the network has offered and will continue to offer throughout and after the truncation, please see the responses to comment 20, and comments 23 and 25.

Comment 7 pertains to space allocation and resources, with particular attention to building facilities, including a library, and a science lab in the school.

The DOE seeks to fully utilize its building capacity to serve students. The Citywide Instructional Footprint (the "Footprint") is the guide used to allocate space to all schools based on the number of class sections they program and the grade levels of the school. The number of class sections at each school is determined by the principal based on enrollment, budget, and student needs; there is a standard guideline of target class size (i.e., number of students in a class section) for each grade level. At the middle school and high school levels, the Footprint assumes every classroom is programmed during every period of the school day except one lunch period. The full text of the Instructional Footprint is available at http://schools.nyc.gov/NR/rdonlyres/78D715EA-EC50-4AD1-82D1-1CAC544F5D30/0/DOEFOOTPRINTSConsolidatedVersion2011_FINAL.pdf.

Across the City, multiple schools located in one building manage their library and librarians in different ways. The DOE anticipates that schools will work together to provide the sufficient staff for a shared library space. In the case of ASE, the school facility does contain a library which students can use, but the organizations within the building have elected not to hire librarian. The DOE and the support network will work with existing organizations during and after the phase-out to strategize how to best meet the staffing needs in the building's library.

Across the City, multiple school organizations share classrooms facilities such as science laboratories, regardless of where the labs are located within the building and relative to various schools' allocated rooms. X362 houses two science laboratories and six science demo rooms which are allocated as shared building space, and these rooms offer sufficient capacity for all schools in the building to meet their students' needs. All ASE students have sufficient access a demo room, and although middle school students do not require science labs, ASE high school students have sufficient access to the building's labs. X362's shared space schedule is planned by the Building Council, which consists of school leaders from each organization in the school building. If schools are encountering challenges with the shared space plan, this should be discussed and resolved through the Building Council. If the principals are unable to agree upon a schedule for shared spaces, there is a mediation process outlined in the Campus Policy Memo, which is available at <http://schools.nyc.gov/community/campusgov>.

Other school organizations in New York City and the Bronx have shared spaces such as libraries and science laboratories without the scheduling or space allocation impacting the schools progress or overall performance.

Comments 8, 14, and 15 pertain to school and building safety, though they offer differing opinions of how safe the school feels. The DOE is very concerned with student and school safety. Pursuant to Chancellor's Regulation A-414, every school/campus is mandated to form a School Safety Committee, which is responsible for developing a comprehensive School Safety Plan that defines the normal operations of the site and what procedures are in place in the event of an emergency. The School Safety Plan is updated annually by the Committee to meet the changing security needs, changes in organization and building conditions and any other factors; these updates could also be made at any other time when it is necessary to address security concerns. The Committee also addresses safety matters on an ongoing basis and makes appropriate recommendations to the Principal(s) when it identifies the need for additional security measures.

The DOE recognizes that there are a variety of environments surrounding school organizations but expects all DOE staff to maintain a safe environment within the school and support student learning regardless of the external environment.

To encourage the creation of a safe environment and to help schools continue to improve the feeling of safety in the school, the DOE makes available the following supports to schools relating to safety and security:

- Providing "Best Practices Standards for Creating and Sustaining a Safe and Supportive School," as a resource guide;
- Reviewing and monitoring school occurrence data and crime data (in conjunction with the Criminal Justice Coordinator and the New York City Police Department);
- Providing technical assistance via the Borough Safety Directors when incidents occur;
- Providing professional development and support to Children's First Network (CFN) Safety Liaisons;
- Providing professional development and kits for Building Response Teams; and
- Monitoring and certifying School Safety Plans annually.

Specifically for ASE, the DOE notes that safety has been a concern for many school stakeholders. On the 2011 New York City School Survey, only 22% of teacher respondents agreed that discipline and order were maintained at the school, and only 60% of student respondents agreed that they felt safe at ASE.

In response to feedback like this, the school and its network have been making efforts to improve the safety in the school. Feedback received during the meetings in the fall with parents stated, for example, that the school was implementing an advisory program aimed in part to improve safety for students.

Comment 9 raised concerns about the certificate of occupancy for building X362. The certificate of occupancy allows ASE access to its building space throughout the school day as well as before and after school for extended-day and after-school programming. The certificate of occupancy has not impacted ASE's capacity to utilize its allocated space in the X362 building and should have no impact on the school's overall performance. Additions to building facilities are determined by the School Construction Authority ("SCA").

Comments 10 and 11 pertain to the challenges faced by the school on account of its co-location with other school organizations. There are currently hundreds of schools in buildings across the City that are co-located; some of these co-locations are multiple DOE schools while others are DOE and public charter schools sharing space. In all cases, the Instructional Footprint is applied to both DOE and public charter schools to ensure equitable allocation of classroom, resource and administrative space. In the very same building, for example, two high schools are getting better outcomes on the progress report (A, B, and C) than ASE (middle through high school grades), which is getting a D.

The DOE seeks to fully utilize all its building capacity to serve students. The DOE seeks to provide high quality education and allow parents/students to choose where to attend.

Please see the DOE's response to comment 7 above, regarding the Instructional Footprint that is used as a guide to allocate space in New York City school buildings in a co-location scenario.

Comment 12 pertains to the school's previous re-locations. The school was originally located in the X983 building, was moved to the X098 building for the 2007-2008 school year, and then moved to its current location in the X362 building for the 2008-2009 school year. ASE has been located in X362 since the start of the 2008-2009 school year. The school has been in the same facility since the start of the 2008 school year. In that school year, ASE's middle school grades received an A on the progress report. Since then, while the school has continued in the same building, the middle school grades' Progress Report declined in the next two years, first to a C, and then to a D.

Further, the DOE notes that of the 2010-2011 eighth-grade students promoted to ninth grade for the current school year, only 24% of the students chose to remain at the school for grades nine through twelve even though all of the promoted students had the first priority into the school's

ninth grade. These students entered as sixth-grade students in 2008-2009, when ASE had moved to its current and permanent location in building X362.

Comment 13 notes the significance of the school and campus name. The DOE recognizes the important role that schools play in their communities and knows that schools throughout the City are not just educational institutions, but rich and tight-knit communities. This is one of the many reasons why the decision to propose a school's truncation is among the most difficult decision the DOE makes.

Additionally, the DOE notes that that campus is named the Albert V. Tuitt Campus, and the campus will retain this name. Some community members do continue to refer to the building by its former name, the Bronxwood campus, since the building is located at the corner of East 228th Street and Bronxwood Avenue.

Comments 16, 18, and 29 raise concerns about where younger siblings of students currently enrolled in ASE will attend middle school in the future and about the availability of other middle school options in the community. While current younger siblings and future middle school students will not be able to enroll in the middle school grades at ASE, District 11 has alternate middle school options for these students.

The DOE notes that admission into sixth grade at ASE is through the District 11 Middle School Choice Process through an unscreened admissions method. There is no priority given to siblings through this process, and as a result, even if ASE were to remain a 6-12 school, younger siblings of current ASE students would not have a priority over other students into the school.

Further, there are sufficient middle school level seats in District 11 to accommodate all students, including those who might have otherwise attended ASE. While the DOE is not proposing to replace the middle school grades of ASE, excluding the seats currently available in ASE's middle school, there are 3,845 total sixth-grade seats in District 11 middle schools. In 2011-2012, there were only 3,322 sixth-grade students enrolled in District 11 middle schools. Therefore, even when excluding the seats that would have been offered at ASE, there is still an excess in seat capacity in District 11 middle schools. The DOE believes that the existing 22 middle schools in District 11 are well-positioned to accommodate the 101 sixth-grade students ASE would have traditionally taken in each year.

While students may no longer be able to attend ASE as a sixth through twelfth grade school, students will have the opportunity to attend grades six through eight at one of the existing middle schools in District 11 and will then have the opportunity to attend ASE or other Citywide high schools for grades nine through twelve. This intervention is intended to provide New York City students with high quality school options at every point in their education.

The table on pages 13-15 of the EIS lists middle school options available in District 11, borough-wide, and Citywide, and include the middle schools' grade spans, building utilization rates, performance data, percentages of special education students ("SE"), percentages of ELLs, admissions information, and site accessibility information. Students can choose from among these options. In addition to the choices included in the table on pages 13-15, two new middle

schools have been proposed to open in District 11, which may also be options for future middle school students in District 11. The co-location proposal for middle school 11X556 will be voted on at the February 9, 2012 PEP meeting and the proposed co-location for middle school 11X566 will be voted on at the March 21, 2012 PEP meeting.

Comment 17 pertains to how grade truncation interferes with the middle school to high school transition process. Successful secondary schools serving grades six through twelve provide a seamless educational experience for seven years to enrolled students. However, as a secondary school, ASE is not accomplishing this goal. Only 35% of 2009-2010 eighth-grade students who were promoted returned to the school for ninth grade in 2010-2011, and only 24% of 2010-2011 eighth-grade students who were promoted returned to the school for ninth grade in 2011-2012. This suggests that ASE is already not providing the seamless transition hoped for by the commenter.

Comments 19, 22, and 24 ask the DOE to give the school more time and resources to improve. As described in the answers to comment 5 and comment 20, the DOE has undertaken extensive review of performance at ASE and has provided numerous unsuccessful supports to the school, leading the DOE to believe that the school's sixth through eighth grades lack the capacity to turn around promptly to better support student needs. ASE's current outcomes cannot be permitted to persist, as ASE students will fall further behind their peers in other middle schools. Indefinitely trying to turn around a school that has struggled for years is not a gamble the DOE is willing to take.

Regarding resource allocation, all public schools in the City are funded through a per pupil allocation. That is, funding "follows" the students and is weighted based on student's grade level and need (incoming proficiency level and special education/ELL/Title I status). While every school across the City receives funding via the same formula, some schools have been less successful in serving students than their peer schools that serve similar populations. Additionally, ASE has been given additional resources in the form of the many supports provided to the school through its network. Despite these additional resources, ASE has been unable to significantly boost student achievement. Because ASE middle school has not been able to use its funds to successfully turn around, the DOE feels that resources would be better allocated elsewhere.

Additionally, one commenter noted that the school had only been open for three years. This statement is incorrect. The school opened in 2005.

Comment 20 inquires about the supports previously provided to ASE. All schools receive support and assistance from their superintendent and Children First Network, a team that delivers operational and instructional support directly to schools. Struggling schools receive supports as part of system-wide efforts to strengthen all schools, and they also receive individualized supports to address their particular challenges. The DOE does everything possible to provide struggling schools with leadership, operational, instructional, and student supports that can help turn a struggling school around. Efforts at ASE have included:

Leadership Support:

- Providing extensive leadership training and mentoring for the principal and assistant principals to help them set clear goals for the school while developing the school’s Comprehensive Education Plan and Language Allocation Plan.
- Coaching and training leadership on implementing plans in support of Citywide instructional initiatives.

Instructional Support:

- Facilitating training for teachers in assessment design, curriculum mapping, and student feedback collection, as tools to meet standards and improve student outcomes.
- Providing professional development opportunities for teachers on best practices for strengthening science curricula, teacher-made resources, and planning.
- Offering professional development opportunities for staff as to how they could incorporate various measures and protocols to evaluate and support student work.
- Offering training for staff to increase, improve, and strengthen instructional supports for English Language Learners.

Operational Support:

- Advising school staff on managing budgeting, human resources, teacher recruitment, and facilities logistics.
- Supporting school staff in developing strategies and practices to improve student attendance.

Student Support:

- Training the School Based Support Team in comprehensive guidance programs and evidence-based counseling strategies to enable them to better provide social and emotional support to students at the school.
- Supporting and training staff in the Healthy Choices Curriculum, aimed at fostering positive decision-making skills and social and emotional growth for students.
- Facilitating college-readiness workshops through College Summit, a program to assist students in the phases of the college admissions process and to educate students about the steps they can take in order to be college ready.
- Supporting school in developing and maintaining relationships with various organizations, including the Children’s Aid Society.

ASE has received individualized support plans directed at the middle school grades, as well as centralized services that the DOE provides to all schools—yet despite this extensive assistance, the school has failed to meet the needs of its students and families.

Comment 21 pertains to the process of engaging the community regarding the proposed truncation. The DOE is committed to engaging with the community, included its elected representatives, for all proposals that require a significant change in school utilization, as detailed in Chancellor’s Regulation A-190.

Consistent with the DOE's approach last year and its desire to incorporate school and community input into the decision-making process, in October and November, the DOE had conversations with 47 struggling schools (41 district schools and 6 public charter schools) that were eligible for an intensive support plan or intervention. In these conversations, the DOE shared information about school performance and listened to the community about their reflections on the school's strengths and weaknesses. This engagement is above and beyond what is mandated by State law. ASE was one of these 47 schools. Superintendent Geraldine Taylor-Brown held meetings with the school parents, School Leadership Team, and staff on November 3, 2011.

The goal for these engagement meetings was to begin or renew conversations with schools and their communities about their performance and actions that could be taken to improve it. The DOE gathered feedback – to understand what's working, what's not working, and what the community has to say about it – before making a decision about whether the school should be given intensive support, truncated, or phased out and replaced with a new option that can support student success. Superintendents also met with the school leadership team, staff and parents to explain the DOE's thinking on why the school is considered struggling and what particular factors show this to be the case.

The DOE also distributed reports for each school that summarized school performance, school supports, and potential action steps. These are easy-to-understand summaries that were handed out at feedback meetings and are posted on the DOE's website.

Again, all of this happened prior to a decision about whether a school would be proposed for phase out or middle school truncation.

When the DOE announced its recommendation to propose ASE for truncation, dedicated teams of educators and engagement specialists spent several days meeting with ASE teachers, parents, and students.

In January, joint public hearings were held for all proposals and public feedback was collected at these meetings and through dedicated email and phone numbers. The DOE's analysis of public comment for all phase-out and truncation proposals, like this one, will be available on-line prior to the vote.

All written materials relating to the proposed truncation of ASE's middle school grades have been made available in Spanish to the ASE school community.

The DOE will continue to engage the community at every possible point regarding this and other proposals for the 2012-2013 school year.

Comments 23 and 25 questioned the efficacy of school closures, with one commenter asking for specific information about supports that would be provided to ASE during the truncation process to ensure success here, in light of past failures.

The DOE notes that while it is proposing the truncation of ASE’s middle school grades, under this proposal the high school grades would remain open. If approved, the DOE will not only support the school’s middle school grades as they phase out, but also the high school grades.

The DOE recognizes that truncating a school is a difficult experience for students, staff, and community members. If this phase out proposal is approved, ASE will receive support in the areas of budget, staffing, programming, community engagement, guidance, and enrollment including, but not limited to:

- Helping the school provide students with options that support their advancement and fully prepare students for their next transition point.
- Working with school staff to foster a positive culture.
- Supporting school leadership in efficiently and strategically allocating resources to ensure a consistent and coherent school environment focused on student outcomes.

As part of this effort, ASE will have a targeted action plan developed by its network. This plan will identify concrete action steps, benchmarks, and year-end goals aimed at immediately improving student achievement. This plan will outline the specific support the network will provide to the school to address the most urgent areas of need, including:

- Leadership coaching;
- Professional Development on instructional strategies for struggling students;
- Identifying grants aimed at specific needs of the school;
- Introducing new programs;
- Supporting the development of a smaller learning environment; and Staff and/or leadership changes.

The DOE is committed to providing a portfolio of high quality school options to students and families. A part of that strategy involves identifying the City’s lowest performing schools and determining whether they can turn around quickly to better serve their student population. For the schools that the DOE determines lack the capacity to turn around quickly to better serve their student populations, the DOE recommends the most serious intervention: gradually phasing out the school over time by no longer enrolling new students.

This year, the DOE is proposing to phase out seven schools and truncate three schools that were opened under this Administration (since 2002). These ten schools represent less than 3% of the schools opened since 2002.

The DOE counts on each of its schools to provide a high-quality education to its students—and holds all schools of them all to the same high standard. If a school isn’t getting the job done for students – whether it was opened recently or not – the DOE is compelled to take serious action to ensure its students don’t fall even further behind.

In June 2010, MDRC, an independent research group, issued a report on NYC’s new small schools strategy. MDRC concluded: “it is possible, in a relatively short span of time, to replace a large number of underperforming public high schools in a poor urban community and, in the

process, achieve significant gains in students' academic achievement and attainment. And those gains are seen among a large and diverse group of students — including students who entered the ninth grade far below grade level and male students of color, for whom such gains have been stubbornly elusive.” (MDRC, “Transforming the High School Experience,” June 2010.)

New York City was ahead of the curve in complying with President Obama’s call to close or turnaround the lowest 5% of schools nationwide and provide better options to families. The DOE simply can’t stand by and allow schools to keep failing kids when the DOE can—and must—do better. New York City’s new schools strategy has helped the DOE to deliver on its core promise to NYC families to provide *all* students with an excellent education.

New schools are overwhelmingly getting the job done for students, and when they are not, and a school is struggling, the same process is followed to phase out and replace that school.

Comment 26 states the concern that the DOE targets specific communities and schools with a high percentage of students of color for phase-out.

The DOE does not consider student or community demographics when making decisions about interventions for struggling schools. A detailed description of the process by which the DOE arrives at a phase-out proposal is provided in the response to comments 5 and 23.

Comment 27 inquires about what will happen to the space in building X362 that ASE’s middle school grades currently occupy after the truncation has been implemented. If this proposal is approved, every school building X362 would, at minimum, continue to be allocated the number of rooms it needs to serve the number of students it has, as indicated in the instructional Footprint. ASE’s Footprint would be adjusted based on the reduced number of sections served in the school. As the school’s Footprint recedes, the number of excess rooms in the building will increase. If there are additional rooms after the proposed truncation takes place, as is expected in building X362, they will be divided among the schools in the building as decided by the Building Council, based primarily on relative school enrollments and the location of schools and rooms within the building. The Building Council consists of leaders from every school organization in the building and together work to make determinations about excess space allocations. If conflicts emerge and progress is impaired at any point, the Building Council would follow the dispute resolution procedures outlined in the Campus Policy Memo available at the following link:

<http://schools.nyc.gov/community/campusgov/KeyDocuments/CampusMemo.htm>.

Comment 28 pertains to challenges in the community outside the school and the need for stronger outside organizations and institutions in the neighborhood. This comment does not relate to the proposal to phase out the school and therefore does not require a response.

Comment 29 voiced concern about the impact of school truncations with respect to various issues, including class size, minority and “at-risk populations,” and public opposition.

Class size is primarily determined by how principals choose to program students at their school within their budget. Thus, no particular proposal, in and of itself, necessarily impacts class size. The Citywide instructional footprint relies upon the current programming at a school (number of sections) to determine the baseline footprint allocation. Decisions to co-locate schools are not based solely on the utilization figures in the Blue Book. The DOE also considers the total number of classrooms in the building and the number of sections currently programmed at all schools in the building or projected to be programmed to determine the availability of excess space and the baseline footprint for each school.

The DOE acknowledges that there some members of the schools' communities that are opposed to the proposal, and/or prioritize smaller class sizes. However, given the schools' longstanding performance struggles, we believe that phasing out certain schools and/or creating new educational options by co-locating new schools will best serve the families in these communities.

With respect to CSM's comments regarding the particular types of students who attend phase-out and truncated schools, it should be noted that schools' Progress Report grades are based in part on a comparison of the school with peer schools serving similar populations of students. Poor performance grades thus indicate that a school is not serving its students well, both objectively and by comparison to other schools serving similar students. Moreover, the new schools proposed to open are anticipated to serve student populations similar to the phasing out school.

Changes Made to the Proposal

No changes have been made to this proposal.